# StratFS Receivership Summary of Invoices 3rd Interim Fee Application

	Invoice #	P/E	Fees	Expenses
Mercadien	222508	8/31/2024	2,255.00	-
Mercadien	222907	9/30/2024	17,345.00	-
Mercadien	223577	10/31/2024	43,154.50	-
Mercadien	223912	11/30/2024	16,739.50	-
Mercadien	224390	12/31/2024	15,510.00	-
Mercadien	224775	1/31/2025	8,166.50	-



Thomas W. McNamara, Esquire - CFPB Receiver 655 W. Broadway, Suite 900 San Diego, CA 92101

Date8/31/2024Invoice No.222508Client No.18821.0

## FOR PROFESSIONAL SERVICES RENDERED:

Re: Consumer Financial Protection Bureau, et al., (Plaintiffs), v. Stratfs, LLC (f/k/a Strategic Financial Solutions, LLC), et al. (Defendants), and Daniel Blumkin, et al., (Relief Defendants). Case No. 24-CV-40-LJV (the "Matter").

For professional services rendered for the above referenced matter from August 1 through August 31, 2024, per the detailed schedule attached.

Current Total: \$ 2,255.00
Prior Balance: 73,785.25
Total Amount Due: \$76,040.25

Mercadien Invoice Summary						
Staff	Level	Hours	Total			
LaCorte	Manager	2.00	610.00			
Pina	Principal	3.50	1,645.00			
Total		5.50	\$ 2,255.00			

Blended Hourly Rate = \$410.00

## **Accounts Receivable Summary**

0-30 days	31-60 days	61-90 days	91-120 days	over 120 days	Balance
\$2,255.00	\$6,094.50	\$27,133.25	\$0.00	\$40,557.50	\$76,040.25

Thomas W. McNamara, Esquire - CFPB Receiver Matter Services from August 1 through August 31, 2024 Invoice #222508

Staff	Date	Services	Rate	Hours	Total
LaCorte	8/1/2024	Responded to L. Jones' email re: Federal return rejected.  Made PDF of the email and added the rejection to Box.	305.00	0.40	122.00
Pina	8/1/2024	Attention to questions from L. Jones about e-file rejection notice from the IRS regarding the extension of the Strategic Family tax return and related issues; coordinated responses with E. LaCorte.	470.00	0.10	47.00
Pina	8/20/2024	Read email from L. Jones regarding additional investigative tasks to perform; revisited prior investigative analyses and coordinated expansion of scope with E. LaCorte in furtherance of requests made by L. Jones.	470.00	0.60	282.00
LaCorte	8/21/2024	Responded to L. Jones' email re: payments to purchase assets.	305.00	0.10	30.50
LaCorte	8/23/2024	With L. Jones and F. Pina to go over case status relating to additional 3rd party subpoenas, additional findings, etc.	305.00	0.60	183.00
LaCorte	8/23/2024	Preparations for status meeting with L. Jones and F. Pina to discuss search for additional vendors to which funds were disbursed that may not have been for legitimate business expenses and related tasks.	305.00	0.40	122.00
Pina	8/23/2024	Participated in project update meeting with L. Jones and E. LaCorte via Teams to discuss status of open items and anticipated next steps. Developed list of additional analyses to be completed including inspection of register compiled by C. Ball detailing payments to vendors and review of other financial records in an effort to identify disbursements potentially used to purchase assets, make bonuses to executives, board members, etc.	470.00	1.40	658.00
Pina	8/28/2024	Attention to email from Receiver regarding discussion to assess status of open items and additional tasks required.	470.00	0.10	47.00
LaCorte	8/29/2024	With F. Pina to debrief on his call with the Receiver regarding analyses to continue and status of case.	305.00	0.20	61.00
Pina	8/29/2024	Telephone call with Receiver to discuss status of case, preparations for upcoming settlement conference, recent discussions with Freed Maxick and additional analysis of potential third-party claims.	470.00	0.40	188.00
Pina	8/29/2024	Worked with E. LaCorte to develop investigative tasks / analyses to advance additional procedures requested by Receiver.	470.00	0.90	423.00
LaCorte	8/29/2024	Communications with L. Jones on status of the vendor payment data the SFS Controller was to provide earlier this week and related tasks.	305.00	0.30	91.50
		Total Hours and Face		5.50	\$ 2.255.00

**Total Hours and Fees** 5.50 <u>\$ 2,255.00</u>



Thomas W. McNamara, Esquire - CFPB Receiver 655 W. Broadway, Suite 900 San Diego, CA 92101

Date9/30/2024Invoice No.222907Client No.18821.0

#### FOR PROFESSIONAL SERVICES RENDERED:

In Re: Consumer Financial Protection Bureau, et al., (Plaintiffs), v. Stratfs, LLC (f/k/a Strategic Financial Solutions, LLC), et al. (Defendants), and Daniel Blumkin, et al., (Relief Defendants). Case No. 24-CV-40-LJV (the "Matter").

For professional services rendered for the above referenced matter through September 30, 2024, per the detailed schedule attached.

Current Total: \$17,345.00
Prior Balance: \$76,040.25
Total Amount Due: \$93,385.25

Mercadien Invoice Summary						
Staff	Level	Hours	Total			
Baresciano	Director	2.60	884.00			
Expense	-	-	27.50			
Fox	Sr. Associate	10.40	2,548.00			
LaCorte	Manager	20.10	6,130.50			
Pina	Principal	16.50	7,755.00			
Total		49.60	\$ 17,345.00			

Blended Hourly Rate = \$ 349.14

# **Accounts Receivable Summary**

0-30 days	31-60 days	61-90 days	91-120 days	over 120 days	Balance
\$17,345.00	\$2,255.00	\$6,094.50	\$27,133.25	\$40,557.50	\$93,385.25

Thomas W. McNamara, Esquire - CFPB Receiver Matter Services Provided through September 30, 2024 Invoice #222907

Staff	Date	Services	Rate	Hours	Total
Expense	9/1/2024	PACER charges required to access case and docket	-	-	27.50
		information.			
Pina	9/3/2024	Began to read and analyze vendor list prepared by J. Stockett	470.00	2.10	987.00
		(StratFS's Director of Digital Revenue and Business			
		Operations), earnings reports from ADP showing employee			
		bonuses and other datasets in an effort to identify			
		questionable transfers to third parties and related party			
		transfers; attention to related emails from L. Jones, L. Smith			
		and E. LaCorte to advance procedures.			
LaCorte	9/3/2024	Read and evaluated information from L. Jones.	305.00	0.20	61.00
LaCorte	9/4/2024	Inspected files in the 07 finance/accounting folders for any	305.00	1.30	396.50
		invoices related to construction services, then for the			
		companies associated with Dae Sung and downloaded			
		relevant files identified.			
Pina	9/4/2024	Asked questions of C. Ball (SFS Controller) regarding how	470.00	0.60	282.00
		best to extract certain information from the Nav system as			
		well as to understand the criteria used when generating			
		certain reports recently provided; scheduled follow-up Teams			
		meeting with C. Ball and E. LaCorte for Friday, 9/6/2024 at			
D'	0/4/2024	1:30pm ET.	470.00	0.50	225.00
Pina	9/4/2024	Read SFS Board of Directors schedule listing the names of	470.00	0.50	235.00
		the company officers, the Board of Directors, and the			
		Advisory Board members as part of broader analysis being			
		performed by E. LaCorte; attention to related emails with L. Jones.			
Fox	9/5/2024	Developed template and began to populate invoice analysis	245.00	3.90	955.50
102	3/3/2021	requested by E. LaCorte/Receiver in preparation for	213.00	3.70	755.50
		upcoming conference.			
LaCorte	9/5/2024	Identified and downloaded additional documents from SFS 07	305.00	1.40	427.00
Lacorte	7/3/2024	accounting folders for review. Coordinated analysis needed	303.00	1.40	427.00
		on the Mandaree Enterprise invoices and related tasks.			
		on the intandarce Enterprise invoices and related tasks.			
LaCorte	9/5/2024	Set-up ADP access and responded to email from L. Jones on	305.00	0.20	61.00
		same.		***	02100
Pina	9/5/2024	Attention to email from J. Jacobs regarding fee application /	470.00	0.10	47.00
		filing status.			
Pina	9/6/2024	Preparations for and participation in Teams meeting with C.	470.00	2.70	1,269.00
		Ball (StratFS Controller) and E. LaCorte to discuss			
		procedures for extracting certain transaction details from			
		NAV, criteria used to generate vendor reports, etc.			
		Preliminary review of emails and files provided by C. Ball in			
		follow-up to earlier discussion; coordinated additional			
		procedures / analyses with internal team to fulfill Receiver's			
		requests.			
Baresciano	9/6/2024	Reviewed new DTC model. Participated on a call with J.	340.00	1.60	544.00
Daresciallo	9/0/2024	O'Donnell of SFS and CAS representatives regarding new	3 <del>7</del> 0.00	1.00	J <del>11</del> .00
		DTC model.			
		DIC MOUCI.			

Thomas W. McNamara, Esquire - CFPB Receiver Matter Services Provided through September 30, 2024 Invoice #222907

Staff	Date	Services	Rate	Hours	Total
Fox	9/6/2024	Worked on invoice analysis requested by Receiver and provided update.	245.00	1.70	416.50
LaCorte	9/6/2024	Teams meeting with SFS Controller to go over the Vendors listing he provided and to gain further insight as to the disbursements and sources noted thereon - with F. Pina.	305.00	1.00	305.00
LaCorte	9/6/2024	Prepared for today's meeting with SFS Controller. Analyzed the Vendor listing received and determined what vendors appear to be missing from the list.	305.00	0.80	244.00
Pina	9/9/2024	Memorialized notes from September 6th meeting with C. Ball (SFS Controller) and shared with L. Jones for review and comment; continued to read and analyze data extracted from NAV and other sources to advance procedures with respect to identifying additional payments out of SFS to potentially related parties; shared preliminary observations and anticipated next steps with L. Jones and E. LaCorte for follow-up.	470.00	1.70	799.00
Fox	9/9/2024	Continued to perform invoice analysis requested.	245.00	2.10	514.50
LaCorte	9/9/2024	Addressed J. Fox's questions in connection with Mandaree invoice analysis.	305.00	0.10	30.50
Baresciano	9/10/2024	Attention to emails from J. O'Donnell and CAS regarding updates to DTC model.	340.00	0.40	136.00
Fox	9/12/2024	Researched related parties as part of the invoice analysis requested; communicated findings and status.	245.00	2.40	588.00
Pina	9/13/2024	Preliminary analysis of latest DTC model from SFS forecasted to 8/31/2024 as provided by J. O'Donnell on September 13, 2024; made notes for follow-up.	470.00	0.70	329.00
Baresciano	9/13/2024	Reviewed new DTC model from J. O'Donnell and summarized for further discussion.	340.00	0.60	204.00
LaCorte	9/16/2024	Reviewed and updated Mandaree related analyses. Searched ND Secretary of State (SOS) records for VCorp and other parties of interest. Searched NY SOS records for VCorp. Performed public record/Google searches for parties of interest and added findings to research folder.	305.00	2.70	823.50
Pina	9/17/2024	Continued analysis focused on the identification of potential related third parties and questionable fund transfers involving certain vendors/companies, individuals and trusts. Follow-up meeting with E. LaCorte to discuss procedures and findings to-date; attention to related email from L. Jones.	470.00	2.30	1,081.00
LaCorte	9/17/2024	Searched 07 Accounting folder for files on certain related parties. Downloaded Ellison, VCorp, and Levy subfolders and inspected documents contained within.	305.00	2.20	671.00
LaCorte	9/17/2024	With F. Pina to go over current findings related to Mandaree, Ellison, VCorp and other parties. Developed status update	305.00	1.00	305.00
		email to be sent to Receiver and Counsel for review and comment.			

Thomas W. McNamara, Esquire - CFPB Receiver Matter Services Provided through September 30, 2024 Invoice #222907

Staff	Date	Services	Rate	Hours	Total
LaCorte	9/18/2024	Continued Finance files research. Analyzed the Seller's Note and traced money usage. Evaluated ESOP records to determine if any correlation.	305.00	2.50	762.50
LaCorte	9/18/2024	Drafted memo of findings and provided additional highlights resulting from analyses to the Receiver and Counsel.	305.00	1.80	549.00
Pina	9/18/2024	Drafted procedures and noteworthy observations to be included in status update summary being developed by E. LaCorte in response to data analyses and related requests made by Receiver and L. Jones.	470.00	0.80	376.00
Pina	9/25/2024	Obtained and read lead provider agreement dated January 1, 2017 between MEC Distribution LLC and Versara Lending, LLC; noted "right to audit" provisions in agreement and searched document production in an effort to identify whether the Company ever exercised its right to audit the books and records as provided for in paragraph 2 (c) of the agreement; related discussions with C. Ball then provided updates and suggested next steps to L. Jones for further discussion with the Receiver.	470.00	2.10	987.00
Pina	9/26/2024	Emails with L. Jones regarding status of 9/20/2024 settlement conference and whether any dates have been set for discovery if no settlement was reached. Follow-up discussion with L. Jones regarding F. Driscoll (COO of Midi Enterprises), who appears to have signed the agreement between Mandaree and Versara and his relationship to and business dealings with SFS and affiliated entities and parties.	470.00	0.60	282.00
Pina	9/30/2024	Preparations for and participation in case status meeting via Teams with L. Jones and E. LaCorte to discuss outcome of 9/20/2024 settlement conference and observations noted todate associated with analyses of SFS vendors/payees of interest including Mandaree Enterprises (Dae Sung)/Midi Enterprises, LLC, Lucky Marketing, VCorp, etc. Suggested next steps for consideration by L. Jones and Receiver based on information analyzed to-date.	470.00	2.30	1,081.00
LaCorte	9/30/2024	Continued Mandaree and Seller's Note analyses prior to today's status meeting. Added documents received from Cameron Ball to Box folder for future reference.	305.00	3.30	1,006.50
LaCorte	9/30/2024	Teams meeting with L. Jones to go over case status and additional analyses to perform relating to associated vendors - with F. Pina.	305.00	1.60	488.00

**Total Hours, Fees and Expenses** 

49.60 \$ 17,345.00



Thomas W. McNamara, Esquire - CFPB Receiver 655 W. Broadway, Suite 900 San Diego, CA 92101

Date10/31/2024Invoice No.223577Client No.18821.0

## FOR PROFESSIONAL SERVICES RENDERED:

In Re: Consumer Financial Protection Bureau, et al., (Plaintiffs), v. Stratfs, LLC (f/k/a Strategic Financial Solutions, LLC), et al. (Defendants), and Daniel Blumkin, et al.,(Relief Defendants). Case No. 24-CV-40-LJV (the "Matter").

For professional services rendered on the above referenced matter through October 31, 2024, per the detailed schedule attached.

Current Total: \$43,154.50
Prior Balance: \$93,385.25
Total Amount Due: \$136,539.75

	Mercadien Invoice Summary						
Staff	Level	Hours		Total			
Fox	Sr. Associate	42.2	\$	10,339.00			
Hicks	Sr. Associate	7.2		1,764.00			
LaCorte	Manager	51.9		15,829.50			
Pina	Principal	13.1		6,157.00			
Thomas	Sr. Associate	37		9,065.00			
Total		151.4	\$	43,154.50			

Blended Hourly Rate = \$ 285.04

# **Accounts Receivable Summary**

0-30 days	31-60 days	61-90 days	91-120 days	over 120 days	Balance
\$43,154.50	\$17,345.00	\$2,255.00	\$6,094.50	\$67,690.75	\$136,539.75

Thomas W. McNamara, Esquire - CFPB Receiver Matter Services Provided through October 31, 2024 Invoice #223577

Staff	Date	Services	Rate	Hours	Total
Fox	10/2/2024	Prepared advisory board member expense reimbursement schedule and began Divvy transactions analyses.	245.00	2.00	490.00
LaCorte	10/2/2024	Identified and exported files related to the advisory board members and Divvy transactions.	305.00	0.60	183.00
Pina	10/3/2024	Facilitated scoping meeting with E. LaCorte and J. Thomas to identify ways to use Mercadien's ChatGPT platform and/or other AI tools to organize and analyze voluminous and disparate datasets and perform comparative analyses between bank statements and vendor records across several years; related preparations and follow-up tasks to advance procedures.	470.00	1.20	564.00
Thomas	10/3/2024	ChatGPT automation of statements.	245.00	2.50	612.50
LaCorte	10/3/2024	With F. Pina and J. Thomas to go over the data mining project and what we need to extract.	305.00	0.50	152.50
Fox	10/3/2024	Completed requested Divvy analysis; call with E. LaCorte to discuss completed advisory board member and Divvy analyses and the data gaps in each.	245.00	0.60	147.00
LaCorte	10/3/2024	Prepared for meeting on using AI tools to search bank statements then provided J. Thomas with test documents and responded to various questions.	305.00	0.30	91.50
Thomas	10/3/2024	Discussion regarding use of ChatGPT to mine bank statements, etc., call with F. Pina and E. LaCorte.	245.00	0.50	122.50
LaCorte	10/3/2024	Debrief with J. Fox on her findings in the Advisory Board and Divvy analyses.	305.00	0.20	61.00
LaCorte	10/8/2024	With J. Thomas and M. Hicks to go over the results for the August 2022 bank statement extraction and fine tuned parameters/criteria.	305.00	2.00	610.00
Hicks	10/8/2024	Prepared for meeting with E. LaCorte regarding automation tools. Tested different tools on sample information with J. Thomas.	245.00	2.50	612.50
Hicks	10/8/2024	Meeting with E. LaCorte to discuss tools and budgets for automated solutions.	245.00	2.00	490.00
Thomas	10/8/2024	Meeting with M. Hicks for TMA/fuzzy logic opinion and testing of outputs.	245.00	2.50	612.50
Thomas	10/8/2024	Meeting with E. LaCorte to show results.	245.00	2.00	490.00
Pina	10/9/2024	Review of draft output resulting from utilizing ChatGPT, Excel fuzzy lookup and TMA word search functions to automate certain bank statement / vendor analyses requested by Receiver; related internal discussions and resource planning tasks.	470.00	2.60	1,222.00
LaCorte	10/9/2024	With F. Pina on the results of using the AI tools to search for unknowns on the bank statements. Discussed timing of other tasks.	305.00	1.20	366.00
LaCorte	10/10/2024	Reviewed the Advisory Board and Divvy analyses prepared by J. Fox and made updates.	305.00	1.30	396.50
Pina	10/10/2024	Attention to email from L. Jones requesting the preparation of a memo describing procedures performed and completed todate in search of potential assets, related observations and suggested next steps; planning meeting with E. LaCorte to coordinate memo preparations; follow-up discussion with M. Hicks (internal data team) to fine-tune use of AI tools to expedite additional analytical procedures; scheduled status update meeting with L. Jones for October 11, 2024 at 2:00 pm ET.	470.00	0.80	376.00
LaCorte	10/10/2024	With F. Pina on L. Jones' request for a memo outlining the research and analyses we've done to discover assets. Read emails.	305.00	0.30	91.50
Fox	10/10/2024	Call with F. Pina regarding Receiver's ask for a memo on tasks performed and findings to-date.	245.00	0.20	49.00

Thomas W. McNamara, Esquire - CFPB Receiver Matter Services Provided through October 31, 2024 Invoice #223577

Staff	Date	Services	Rate	Hours	Total
Hicks	10/10/2024	Computer Assisted Auditing Technique (CAAT): Responded to F. Pina's questions regarding making the Excel fuzzy logic more precise.	245.00	0.20	49.00
Pina	10/11/2024	Preparations for and participation in case status update meeting with L. Jones and E. LaCorte to discuss certain forensic accounting and investigative procedures performed to-date, gaps in information, scope limitations encountered, observations noted and recommended next steps; attention to follow-up requests and related emails.	470.00	2.20	1,034.00
LaCorte	10/11/2024	Prepared for today's meeting with L. Jones re: bank statement, advisory board and payroll analyses. Exported GL details and other information from NAV system. Prepared AI bank statement project presentation.	305.00	2.90	884.50
Fox	10/11/2024	Prepared additional analysis on certain expenses identified.	245.00	2.30	563.50
LaCorte	10/11/2024	Meeting with L. Jones to go over the findings associated with the Advisory Board and Divvy transactions then presented the AI bank statement search process in progress - with F. Pina.	305.00	1.30	396.50
LaCorte	10/11/2024	With J. Fox on the General Ledger detail exports added to our files so she can continue her analyses on Mandaree and the board fees.	305.00	0.20	61.00
LaCorte	10/11/2024	Post meeting discussion with F. Pina regarding memo requested by L. Jones for the Receiver in connection with detailed search for assets including process and findings.	305.00	0.20	61.00
Fox	10/11/2024	Call with E. LaCorte to discuss additional analysis needed on payments to Dae Sung and board fees.	245.00	0.20	49.00
LaCorte	10/14/2024	Downloaded additional information from SFS remote servers. Reviewed the Citibank analyses for Birds, Behar and Sasson.	305.00	4.20	1,281.00
Fox	10/14/2024	Worked on requested analysis related to select invoices.  Meeting with E. LaCorte regarding same. Began additional cash flow analysis for Blumkin.	245.00	3.80	931.00
Pina	10/14/2024	Reviewed data analysis prepared by C. Ball in connection with compensation paid to advisory board members; developed findings memo template to be updated by E. LaCorte.	470.00	1.40	658.00
LaCorte	10/14/2024	With J. Fox on updates needed to our analyses: Advisory Board and Mandaree transactions.	305.00	0.40	122.00
Pina	10/15/2024	Continued to develop memo narratives and supporting schedules; coordinated updates with E. LaCorte based on additional procedures and new observations noted.	470.00	0.80	376.00
LaCorte	10/15/2024	Email with L. Jones re: moving forward with use of AI tools for bank statement project. Email to J. Thomas on the data mining project details. Added the 2022 and 2023 bank statements to the project Box Folder for use in data analysis.	305.00	0.90	274.50
LaCorte	10/15/2024	Call with F. Pina to go over the Behar/Birds Citibank analyses, other open analyses and memo status. Provided link to analyses.	305.00	0.90	274.50
LaCorte	10/15/2024	Began working on the asset search memo.	305.00	0.40	122.00
Fox	10/15/2024	Completed invoice tracing analysis and communicated certain inconsistencies noted to E. LaCorte.	245.00	0.40	98.00
LaCorte	10/16/2024	Drafted ESOP memo section. Accessed NAV for additional GL details for final analyses. Started to develop memo exhibits.	305.00	3.70	1,128.50
Fox	10/16/2024	Worked on cash flow analysis of Blumkin and advisory board fees analysis.	245.00	2.60	637.00
LaCorte	10/17/2024	Continued to draft memo to Receiver.	305.00	4.30	1,311.50
Thomas	10/17/2024	ChatGPT- January, March and April runs.	245.00	4.00	980.00
Fox	10/18/2024	Completed cash flow analysis on Blumkin.	245.00	4.60	1,127.00
Thomas	10/18/2024	Addressed April, May, June and July extracts.	245.00	5.00	1,225.00

Thomas W. McNamara, Esquire - CFPB Receiver Matter Services Provided through October 31, 2024 Invoice #223577

Staff	Date	Services	Rate	Hours	Total
Staff Pina  LaCorte	Date 10/18/2024 10/18/2024	Developed narratives to be included in the case status update memo requested by L. Jones, focused on the investigation, identification and quantification of certain Receivership estate assets and potentially improper fund transfers; Teams meeting with E. LaCorte to discuss preliminary observations and to close-out open procedures required to finalize the memo for review by L. Jones and Receiver McNamara.  Continued drafting memo to Receiver re: money flow and potential assets.	<b>Rate</b> 470.00	1.60 1.30	<b>Total</b> 752.00
LaCorte	10/18/2024	With F. Pina go over general comments on the draft memo. Emailed L. Jones with updated timing for the draft memo.	305.00	0.50	152.50
Hicks	10/18/2024	Set up second PC with shared screen for J. Thomas to allow her to run ChatGPT for data extraction on multiple computers. Discussed progress tracking with J. Thomas.	245.00	0.50	122.50
Fox	10/18/2024	Call with E. LaCorte regarding additional cash flow analysis needed and discussion on a specific Blumkin account before proceeding.	245.00	0.20	49.00
LaCorte	10/21/2024	Completed draft Memo for Receiver re: asset search, money tracing and related findings. Made updates to the exhibits and per F. Pina's comments from earlier discussion.	305.00	6.80	2,074.00
Fox	10/21/2024	Worked on cash flow analyses related to Blumkin and Timberline.	245.00	6.40	1,568.00
Thomas	10/21/2024	Addressed August, September and October extracts.	245.00	7.00	1,715.00
Pina	10/21/2024	Continued to update status memo and exhibit files; addressed questions raised by E. LaCorte regarding additional information required to close-out open analyses.	470.00	1.00	470.00
LaCorte	10/21/2024	With F. Pina to discuss his comments on the draft memo and explained some of the results from various analyses.	305.00	0.90	274.50
Fox	10/21/2024	Call with E. LaCorte to discuss findings noted in cash flow analysis prepared to date.	245.00	0.20	49.00
Fox	10/22/2024	Completed Timberline cash flow analysis and began analysis of Claudio's transactions.	245.00	3.60	882.00
Thomas	10/22/2024	Addressed November, December and February extracts.	245.00	4.00	980.00
LaCorte	10/22/2024	Updated memo per F. Pina's comments then provided to Receiver and L. Jones for review and comment.	305.00	1.20	366.00
Pina	10/22/2024	Completed updates to estate assets and transfers memo prior to sharing with Receiver and L. Jones for review.	470.00	0.70	329.00
LaCorte	10/22/2024	Exported 2020 bank statements from 07 Accounting folder and added to Box folder. Status discussion with J. Fox on the Claudio's and Timberline analyses.	305.00	0.70	213.50
Fox	10/22/2024	Proof-read and finalized memo and exhibits.	245.00	0.70	171.50
Fox	10/23/2024	Completed Claudio's cash flow analysis and worked on Sunseeker's cash flow analysis.	245.00	5.90	1,445.50
Thomas	10/23/2024	2023 final output.	245.00	2.00	490.00
LaCorte	10/23/2024	With J. Thomas and M. Hicks to go over the output from the 2023 ChatGPT bank statement analysis.	305.00	0.80	244.00
Hicks	10/23/2024	Met with J. Thomas and E. LaCorte regarding vendor list comparison output.	245.00	0.80	196.00
Thomas	10/23/2024	Meeting with E. LaCorte and M. Hicks and related preparations.	245.00	1.00	245.00
Hicks	10/23/2024	Met with J. Thomas to assist her with similarity testing.	245.00	0.50	122.50
Fox	10/25/2024	Completed Sunseeker's cash flow analysis; updated all entity master flow of funds schedule and communicated status to E. LaCorte.	245.00	2.80	686.00

Thomas W. McNamara, Esquire - CFPB Receiver Matter Services Provided through October 31, 2024 Invoice #223577

Staff	Date	Services	Rate	Hours	Total
Pina	10/28/2024	Working session with J. Thomas/M. Hicks and E. LaCorte to review output resulting from comparative analysis between 2023 bank statement data and vendor listing produced by C. Ball (SFS Controller); coordinated next steps including manual review of 2023 data anomalies with E. LaCorte and additional	470.00	0.80	376.00
		analysis of 2022 bank statement / vendor data with J. Thomas/M. Hicks; made notes.			
Hicks	10/28/2024	Met with F. Pina, E. LaCorte and J. Thomas to discuss CAAT output.	245.00	0.70	171.50
Thomas	10/28/2024	Worked on 2022 extracts.	245.00	0.50	122.50
Thomas	10/28/2024	Meeting to discuss output on SFS matter with F. Pina and E. LaCorte.	245.00	0.70	171.50
LaCorte	10/28/2024	Meeting with F. Pina and data team to review 2023 output from AI program analysis. Reviewed the 0% matches from the bank statement search and filtered for debits only to see the payees listed.	305.00	0.80	244.00
Thomas	10/29/2024	Began 2022 data analysis with January and February statements.	245.00	3.50	857.50
LaCorte	10/29/2024	Review of 2023 output produced by data team.	305.00	1.80	549.00
LaCorte	10/30/2024	Continued to review 2023 output / findings. Updated parties list. Researched Birds Fountains and related Lee County, FL property. Emailed L. Jones with new findings, etc. Read the Barclays Unquoted Investments LT 2023 audited financials to determine connection with SFS besides the payment.	305.00	5.30	1,616.50
LaCorte	10/31/2024	Updated files and notes: re AI bank statement analyses. Reviewed the Citibank account analyses re: money movement. Accessed Nav System to find what account the payment to Barclays was posted to.	305.00	4.50	1,372.50
Fox	10/31/2024	Worked on analysis related to the bank statement's vendor list per E LaCorte's request.	245.00	4.60	1,127.00
Thomas	10/31/2024	March and April extraction	245.00	1.80	441.00
LaCorte	10/31/2024	With J. Fox on overview of the AI data mining output and the analyses needed to quantify payments to various known and unknown parties.	305.00	1.00	305.00
Fox	10/31/2024	Call with E. LaCorte to discuss additional analysis needed.	245.00	1.10	269.50
LaCorte	10/31/2024	Read the applicable Strategic Family 2022 audited financial statement footnotes related to loans with insiders and dates to update time line. Began layout for the Citibank transactions to use as an exhibit to supplemental memo.	305.00	0.50	152.50

Total Hours and Fees 151.40 \$ 43,154.50



Thomas W. McNamara, Esquire - CFPB Receiver 655 W. Broadway, Suite 900 San Diego, CA 92101

**Date** 12/16/2024 Invoice No. 223912 Client No. 18821.0

## FOR PROFESSIONAL SERVICES RENDERED:

In Re: Consumer Financial Protection Bureau, et al., (Plaintiffs), v. Stratfs, LLC (f/k/a Strategic Financial Solutions, LLC), et al. (Defendants), and Daniel Blumkin, et al., (Relief Defendants). Case No. 24-CV-40-LJV (the "Matter").

For professional services rendered on the above referenced matter from November 1 through November 30, 2024, per the detailed schedule attached.

> Current Total: \$16,739.50 Prior Balance: 62,754.50 Total Amount Due: \$79,494.00

	Mercadien Invoice Summary						
Staff	Level	Hours	Total				
Fox	Sr. Associate	24.10	5,904.50				
Hicks	Sr. Associate	1.20	294.00				
LaCorte	Manager	12.80	3,904.00				
Pina	Principal	3.80	1,786.00				
Thomas	Sr. Associate	19.80	4,851.00				
Total		61.70	\$ 16,739.50				

Blended Hourly Rate = \$ 271.30

Thomas W. McNamara, Esquire - CFPB Receiver Matter Services Provided from November 1 through November 30, 2024 Invoice #223912

Staff	Date	Services	Rate	Hours	Total
LaCorte	11/1/2024	Update timeline schedule and prepared Citibank money movement presentation.	305.00	4.00	1,220.00
Fox	11/1/2024	Continued to work on vendor analyses.	245.00	4.70	1,151.50
Thomas	11/1/2024	Developed / formatted extracts of select bank statements for analysis using AI tools.	245.00	3.00	735.00
Thomas	11/4/2024	Formatted and loaded additional bank statement extracts for ChatGPT analysis.	245.00	5.50	1,347.50
Fox	11/4/2024	Worked on bank statement analysis.	245.00	0.80	196.00
Thomas	11/5/2024	Continued with bank statement extraction tasks.	245.00	5.50	1,347.50
Thomas	11/6/2024	Processed additional bank statement extracts using AI tools then met with M. Hicks and E. LaCorte to discuss resulting output and anticipated next steps.	245.00	5.80	1,421.00
LaCorte	11/6/2024	Preliminary inspection of 2022 data mining output then meeting with J. Thomas and M. Hicks to evaluate the 2022 data mining results and additional information needed to finalize analysis.	305.00	0.90	274.50
Hicks	11/6/2024	Applied Computer Assisted Auditing Techniques (CAAT) then attended CAAT follow-up meeting with E. LaCorte and J. Thomas to review results for 2022 data.	245.00	1.20	294.00
LaCorte	11/7/2024	Began detailed analysis of 2022 data mining results and noted findings. Quantified the interest earned by Timberline 1042 in the Citibank transactions, etc. Emailed L. Jones to provide a status update.	305.00	1.10	335.50
Pina	11/7/2024	Project management and oversight tasks including debrief with E. LaCorte to assess status of comparative analysis of 2022 bank statements to vendor listing based on use of ChatGPT / AI tools.	470.00	0.40	188.00
LaCorte	11/7/2024	Status discussion with F. Pina regarding the 2022 preliminary data mining exercise and the 2023 data analyses assigned to J. Fox.	305.00	0.40	122.00
Pina	11/11/2024	Initial discussions/emails with A. Wall (Counsel), L. Jones and E. LaCorte in furtherance of Receiver's recent decision to proceed with auditing the MEC/Mandaree books and records under the Lead Agreement(s). Provided comments to the notice to audit letter drafted by Counsel for further evaluation and consideration.	470.00	1.60	752.00
Fox	11/11/2024	Worked on requested bank statement analysis.	245.00	3.20	784.00
Pina	11/12/2024	Read relevant documents governing the relationship with MEC and certain Receivership entities and developed sample notice to audit letter language and preliminary document request list for Counsel's consideration in connection with the anticipated audit of MEC's books and records contemplated by the Receiver under the Lead Agreements identified; working session with E. LaCorte required to finalize proposed edits and updates to Counsel's initial drafts.	470.00	1.70	799.00
LaCorte	11/12/2024	Read emails regarding SFS right to audit Mandaree and letter drafted by Counsel. Looked at our analyses and drafted additional comments for incorporation. Accessed Finance 07 folder for Augusta Partners information to further analyses. Worked with F. Pina to finalize draft letter.	305.00	2.30	701.50
Fox	11/13/2024	Began 2022 bank transaction analysis after meeting with E. LaCorte to identify learnings from analysis of 2023 results.	245.00	1.30	318.50

Thomas W. McNamara, Esquire - CFPB Receiver Matter Services Provided from November 1 through November 30, 2024 Invoice #223912

Staff	Date	Services	Rate	Hours	Total
LaCorte	11/13/2024	With J. Fox on the 2023 data mining results and additional analyses she's preparing as previously discussed. Notified J. Fox that the 2022 data mining results are ready for analysis and set internal deadlines for when all open analyses should be completed.	305.00	0.60	183.00
Fox	11/14/2024	Continued analysis of 2022 bank statements and additional analysis on 2023 transactions per E LaCorte.	245.00	3.70	906.50
Pina	11/14/2024	Discussion with Receiver about the status of our last fee application and related matters.	470.00	0.10	47.00
Fox	11/15/2024	Continued to work on 2022 bank statement analysis.	245.00	1.60	392.00
Fox	11/18/2024	Made updates to the 2022 and 2023 bank statement analyses based on inspection of additional documents and feedback.	245.00	6.10	1,494.50
LaCorte	11/18/2024	Began drafting outline for supplemental memo per F. Pina's request.	305.00	0.30	91.50
Fox	11/19/2024	Completed open tasks associated with 2022 and 2023 bank statement analyses for E. LaCorte.	245.00	1.40	343.00
LaCorte	11/19/2024	Conveyed additional information to J. Fox related to the Birds Investment / Birds Financial analyses after comparison to the data mining results.	305.00	0.10	30.50
Fox	11/20/2024	Performed additional analyses using 2022 and 2023 bank statements related to the Birds' entities.	245.00	0.90	220.50
LaCorte	11/20/2024	Call with J. Fox to go over latest data mining analyses completed and next steps to advance procedures.	305.00	0.40	122.00
Fox	11/20/2024	Call with E. LaCorte to discuss results of completed analyses and next steps.	245.00	0.40	98.00
LaCorte	11/25/2024	Began going through the 2022 and 2023 bank statement transactions flagged for further investigation. Drafted notes to include as part of the supplemental memo and developed select exhibits to be attached thereto.	305.00	2.70	823.50

Total Hours and Fees 61.70 <u>\$ 16,739.50</u>



Thomas W. McNamara, Esquire - CFPB Receiver 655 W. Broadway, Suite 900 San Diego, CA 92101

**Date** 1/13/2025 Invoice No. 224390 Client No. 18821.0

#### FOR PROFESSIONAL SERVICES RENDERED:

In Re: Consumer Financial Protection Bureau, et al., (Plaintiffs), v. Stratfs, LLC (f/k/a Strategic Financial Solutions, LLC), et al. (Defendants), and Daniel Blumkin, et al., (Relief Defendants). Case No. 24-CV-40-LJV (the "Matter").

For professional services rendered on the above referenced matter from December 1 through December 31, 2024, per the detailed schedule attached.

> Current Total: \$15,510.00 Prior Balance: \$79,494.00 Total Amount Due: \$95,004.00

Mercadien Invoice Summary					
Staff	Level	Hours	Total		
Fox	Sr. Associate	7.00	1,715.00		
LaCorte	Manager	27.20	8,296.00		
Pina	Principal	11.70	5,499.00		
Total		45.90	\$ 15,510.00		

Blended Hourly Rate = \$ 337.91

Thomas W. McNamara, Esquire - CFPB Receiver Matter Services Provided from December 1 through December 31, 2024 Invoice #224390

Staff	Date	Services	Rate	Hours	Total
LaCorte	12/2/2024	Continued Citibank account tracing analyses and review procedures.	305.00	4.60	1,403.00
LaCorte	12/2/2024	Worked on drafting narratives for supplemental memo to be shared with Receiver and team.	305.00	3.00	915.00
Fox	12/3/2024	Prepared requested analyzes as exhibits for supplemental memo.	245.00	4.90	1,200.50
LaCorte	12/3/2024	Finished Citibank account analyses.	305.00	3.30	1,006.50
LaCorte	12/3/2024	Continued to update supplemental memo with additional observations noted.	305.00	2.90	884.50
LaCorte	12/3/2024	With J. Fox to go over the updated analyses and exhibits needed for supplemental memo.	305.00	0.70	213.50
Fox	12/3/2024	Meeting with E. LaCorte to discuss case status and additional analyses required; related preparations.	245.00	0.80	196.00
LaCorte	12/4/2024	Completed the draft supplemental memo and exhibits and prrovide to F. Pina for review and comment.	305.00	5.70	1,738.50
Pina	12/4/2024	Review of various Citibank account statement transaction analyses to identify noteworthy transactions and/or patterns to highlight in supplemental memo; meeting with E. LaCorte to address open questions related to IRC §1042 requirements / 1042 loan transactions noted in Citibank statements and relationship to the SFS ESOP transaction.	470.00	2.60	1,222.00
LaCorte	12/4/2024	Reviewed exhibits prepared by J. Fox in support of the supplemental memo and provided updates as necessary.	305.00	0.80	244.00
LaCorte	12/4/2024	Performed research required to confirm certain findings identified in the supplemental memo. Read ESOP related documents / IRC §1042 as requested by F. Pina in response to notation on the Citibank statements.	305.00	1.30	396.50
Fox	12/4/2024	Updated supplemental memo exhibits to reflect additional data.	245.00	0.50	122.50
Pina	12/5/2024	Performed review of output resulting from ChatGPT bank statement transaction analyses; updated supplemental narrative to reflect noteworthy observations.	470.00	1.70	799.00

Thomas W. McNamara, Esquire - CFPB Receiver Matter Services Provided from December 1 through December 31, 2024 **Invoice #224390** 

Staff	Date	Services	Rate	Hours	Total
Pina	12/10/2024	Continued to perform/finalize analyses in connection with transactions associated with Birds Investments, Inc. and Birds Financial, LLC; Dae Sung/Midi Enterprises/Mandaree, and Lucky Marketing; R. Sasson, A. Behar and D. Blumkin Citibank accounts; Augusta Partners, LLC, Apollo Jets, LLC and Barclays Unquoted Investments Limited. Drafted related narratives to include in Supplemental Memo to be shared with the Receiver and his team for consideration and follow-up.	470.00	4.40	2,068.00
Pina	12/11/2024	Worked with E. LaCorte to update Supplemental Memo and develop additional exhibits to support memo narratives; requested E. LaCorte format/finalize Supplement Memo package then share with T. McNamara and L. Jones for review and follow-up.	470.00	1.70	799.00
LaCorte	12/11/2024	Read and incorporated F. Pina's comments in the draft supplemental memo as discussed.	305.00	1.80	549.00
LaCorte	12/12/2024	Updated and finalized supplemental memo and exhibit files to be formatted and sent to the Receiver for review and comment.	305.00	3.10	945.50
Fox	12/13/2024	Compiled final supplemental memo and exhibit files into package sent to Receiver and team.	245.00	0.80	196.00
Pina	12/16/2024	Emails with A. Wall, Esquire regarding status of MEC audit requests including anticipated timing; planning tasks in anticipation of receipt of document production this week.	470.00	0.50	235.00
Pina	12/17/2024	Resource planning and related tasks in advance of receipt of document production expected in response to Receiver's notice of audit delivered to MEC on November 18, 2024 and follow-up discussions with Counsel.	470.00	0.80	376.00

**Total Hours and Fees** 

45.90 \$ 15,510.00



Thomas W. McNamara, Esquire - CFPB Receiver 655 W. Broadway, Suite 900 San Diego, CA 92101

**Date** 1/31/2025 Invoice No. 224775 Client No. 18821.0

## FOR PROFESSIONAL SERVICES RENDERED:

In Re: Consumer Financial Protection Bureau, et al., (Plaintiffs), v. Stratfs, LLC (f/k/a Strategic Financial Solutions, LLC), et al. (Defendants), and Daniel Blumkin, et al., (Relief Defendants). Case No. 24-CV-40-LJV (the "Matter").

For professional services rendered on the above referenced matter from January 1 through January 31, 2025, per the detailed schedule attached.

> Current Total: 8,166.50 Prior Balance: 95,004.00 Total Amount Due: \$103,170.50

Mercadien Invoice Summary						
Staff	Hours		Total			
Fox	Sr. Associate	15.40		3,773.00		
LaCorte	Manager	6.70		2,043.50		
Pina	Principal	5.00		2,350.00		
Total		27.10	\$	8,166.50		

Blended Hourly Rate = \$ 301.35

Thomas W. McNamara, Esquire - CFPB Receiver Matter Services Provided from January 1 through January 31, 2025 Invoice #224775

Staff	Date	Services	Rate	Hours	Total
Pina	1/6/2025	Attention to emails from L. Jones regarding Receiver's questions/intentions as it relates to potentially terminating the ESOP and the 401(k) plan; read and analyzed available financial statements and Forms 5500 in addition to performing technical research and public record searches to address questions raised; preliminary discussion with S. Noon (Mercadien's Employee Benefit Plan Audit Group Leader) to obtain his availability for a follow-up call with L. Jones tomorrow at 1:30 PM (EST).	470.00	2.30	1,081.00
Pina	1/7/2025	Strategic planning discussion with L. Jones, E. LaCorte and S. Noon regarding current status of outstanding Forms 5500, 401(k) audits and related matters; addressed questions raised by L. Jones on behalf of the Receiver; developed suggested next steps in response.	470.00	1.90	893.00
LaCorte	1/7/2025	Meeting with F. Pina, S. Noon and L. Jones to go over the issues with the SFS 401k plan and the outstanding prior year issues including audit.	305.00	0.70	213.50
Fox	1/13/2025	Developed an inventory of produced documents in the Mandaree audit matter.  Began analysis of Mandaree/Midi bank statements. Fielded call from E.  LaCorte on additional work needed.	245.00	2.20	539.00
LaCorte	1/13/2025	With J. Fox to go over the document inventory to prepare and sample testing of known Mandaree invoices to bank statements provided. Read and responded to L. Jones email and checked if files she added loaded properly.	305.00	0.50	152.50
Fox	1/14/2025	Completed analysis related to Mandaree production including call with E. LaCorte to review findings.	245.00	2.90	710.50
Fox	1/14/2025	Prepared sample analysis on Lucky Marketing line items related to the Mandaree production.	245.00	2.40	588.00
LaCorte	1/14/2025	With J. Fox and her findings on the information provided by Mandaree.  Discussed additional sample testing relating to the Lucky Marketing invoices.	305.00	0.70	213.50
LaCorte	1/15/2025	Reviewed and updated the Mandaree analyses prepared by J. Fox.	305.00	0.90	274.50
LaCorte	1/17/2025	Drafted additional notes on Mandaree information received regarding cash activity, 2024 and audited financials. Responded to L. Jones email with our preliminary findings.	305.00	0.70	213.50
Fox	1/21/2025	Prepared additional analysis requested on cash activity in relation to Mandaree production.	245.00	2.60	637.00
LaCorte	1/21/2025	With J. Fox to address questions on the cash activity files for Mandaree required to start analyses.	305.00	0.10	30.50
Fox	1/23/2025	Began comparison of transactions from cash activity report to bank statements.	245.00	1.70	416.50
Fox	1/24/2025	Wrapped up cash activity testing to bank statements to try and identify account owners and any mismatched information.	245.00	3.20	784.00
LaCorte	1/24/2025	Reviewed J. Fox's analyses of Mandaree transactions and transfers. Read the audited financial statements. Prepared notes on money movement.	305.00	0.70	213.50
LaCorte	1/24/2025	With J. Fox on her analyses of the money movement from Mandaree's account, etc.	305.00	0.40	122.00
Fox	1/24/2025	Call with E. LaCorte to discuss analysis of cash activity to bank statements.	245.00	0.40	98.00
LaCorte	1/24/2025	Emailed L. Jones on the Mandaree production for 2022 and noted cash activity is a duplicate of 2023 information. Attention to response from L. Jones and her follow-up questions.	305.00	0.10	30.50
LaCorte	1/28/2025	Prepared schedule of cumulative revenue per financials vs. our schedule of known funds paid by SFS. Provided L. Jones with what we currently know about Mandaree's financial status based on the documents produced to date.	305.00	1.80	549.00
Pina	1/30/2025	Read emails and analyzed attached files from L. Jones in connection with the bank's request for updated financial schedules demonstrating activities of the business since late May 2024, including actual cash receipts and disbursements through December 2024. Developed approach and coordinated the completion of requested tasks with E. LaCorte.	470.00	0.80	376.00
LaCorte	1/30/2025	Read email from L. Jones re: Bank's request for updated cash flow and worked with F. Pina to develop next steps.	305.00	0.10	30.50
	1	Total Hours and Fees	l l	27.10	\$ 8,166.50

27.10 \$ 8,166.50